

Forest & Bird Dunedin

PO Box 6230

Dunedin North

Dunedin 9059

dunedin.branch@forestandbird.org.nz

Director-General

Department of Conservation

Ōtepoti/Dunedin Service Centre

Level 1, John Wickliffe House

265 Princes Street

Ōtepoti/Dunedin, 9016

dnsubmissions@doc.govt.nz

11 April 2022

Submission on an intention to grant accommodation and easement concessions in Aramoana

Introduction

1. This submission is made on behalf of the Dunedin Branch of the Royal Forest and Bird Society Incorporated (**Forest & Bird**).
2. Forest & Bird is New Zealand's longest running independent conservation organisation. Its constitutional purpose is to take all reasonable steps within its power for the preservation and protection of the indigenous flora and fauna and the natural features of New Zealand.
3. Forest & Bird has for many years had a strong interest and involvement in the Dunedin area and has a long-standing interest in improving biodiversity and protecting and enhancing landscapes in the wider Otago region. The Dunedin branch is involved in a wide range of conservation and advocacy activities.
4. The Dunedin Branch has had a substantial history at Aramoana specifically:
 - a. The branch successfully opposed a proposed aluminium smelter in the area; and
 - b. The branch paid for the boardwalk over the saltmarsh, with associated signage.

Site and activities

5. The application relates to the occupation of public conservation land (**PCL**), specifically the Aramoana Conservation Area and Aramoana Ecological Area. These areas are described in Otago Conservation Management Strategy (**Otago CMS**) and this is summarised in the *Notified Concession Officer's Reports to Decision Maker* for each of the sites, section 1.4. Forest & Bird adopts this summary of distinctive features and wishes to highlight that:
 - a. The saltmarsh is a matrix of open sand flats with and without vegetation;
 - b. the saltmarsh and adjacent areas are of national significance, with features most other saltmarshes in Otago no longer retain;
 - c. the tidal flats provide the most important area of wader habitat in Otago;
 - d. the area is important nationally as a fish breeding and nursery area, including being characterised as kohaka; and
 - e. the saltmarsh has very high entomological values.
6. Appendices 8 and 9 of the Otago CMS lists pressures and threats to specific places. Entries relevant to the Aramoana Ecological Area and the application include:
 - a. coastal development;
 - b. waste and stormwater effluent discharges
 - c. chronic disturbance, harassment and occasionally more severe interactions between people, dogs and coastal wildlife; and
 - d. vehicles.
7. In addition, Forest & Bird members provide the following observations about the place:
 - a. There is a resident population of godwits (*Limosa lapponica*) at the site year around. The three main areas that the godwits frequent are the sandspit at the end of Warrington Beach, the sandbars between the saltmarsh and the shipping channel and islands at Hoopers Inlet. They move between these places through the day, likely due to tidal and food influences.
 - b. Other waders are also present, such as red knots (*Calidris canutus*), banded dotterels (*Charadrius bicinctus*) and South Island pied oyster catchers (*Haematopus finschi*).
 - c. The wading birds are flighty and take to the air at the slightest disturbance. For the godwits, it seems there are not many other places for them to move to when disturbed. The occupation presents an almost permanent disturbance to the populations.
 - d. Yellow-eyed penguins (*Megadyptes antipodes*) have used the end of the spit for molting.

- e. Sea lions (*Phocarcots hookeri*) frequent the area and have breed within the saltmarsh in recent years. Last year a pup was born in between two of the houses at the sites. Adult sea lions use the point for coming out of the water to rest.
 - f. Bow waves from the shipping lane are often thought to be disruptive to populations in the saltmarsh. However, observations from Forest & Bird members suggest that this is not so much the case – particularly ships are when fitted with anti-bow wave devices. Disturbance from bow waves is far less problematic than that of human disturbance.
 - g. Related photographs from Forest & Bird members are shown in Appendix 1.
8. Forest & Bird adopts and submits in opposition to the full range of activities identified in the Notified Concession Officer's Report to Decision Maker for each of the four sites.
 9. Forest & Bird acknowledges that the cottage/pilot houses at sites 1 – 3 are registered with Heritage New Zealand and characterised by the same as the Pilots' Cottages Historic Area, North Spit Aramoana.¹
 10. Forest & Bird also acknowledges the description of assurances from the Department of Conservation (**the Department**) to the owners/occupiers since the land was purchased in 1993, that:

"... a formal lease and/or licence would be entered into to regularise the tenure at this location for the occupation of the land and access to the cottage/pilot houses/dwelling..."^{2,3}

In the time since the land was purchased, the Otago CMS came into force.

11. In summary, the area to be occupied sits within a place of extremely high conservation and ecological value and the ongoing management has been subject to low certainty for all parties. A formal agreement has not been entered into by the parties for close to 30 years since the land was purchased. During this uncertain period, it is understood that the sites have been occupied.
12. Forest & Bird seeks that this concession application provide certainty for all parties, as to the future management of the occupation, including the environment and the public.

Adverse effects arising from the application

13. Forest & Bird's primary concern is for the disturbance or harm of wildlife and the ecosystem at the Aramoana Conservation Area and Aramoana Ecological Area. With permanent structures, the nature of the occupation is likely to facilitate are a frequent human presence. It is well documented that increased human pressure on ecosystems poses a risk to ecosystems through:
 - a. disturbance to wildlife, such as disturbing feeding or breeding;
 - b. harm to wildlife, intentional or not, from humans and domesticated animals such as dogs;

¹ Notified Concession Officer's Report to Decision Maker for sites 1 – 3, section 1.1.

² Ibid, section 1.1.

³ Notified Concession Officer's Report to Decision Maker for site 4, section 1.1

- c. increased pressure on vegetation, leading to habitat loss and erosion; and
 - d. vehicle damage.
14. It was noted previously in this submission that the Otago CMS lists issues related to these as current pressures or threats on the Aramoana Conservation Area and Aramoana Ecological Area. These issues identified during development of the Otago CMS while the current occupation was ongoing.
 15. In addition, observations by Forest & Bird members, covered above, suggest that the effects of disturbance by humans is near permanent as a result of the occupation, particularly for wading birds.
 16. Table 4 of the *Notified Concession Officer's Report to Decision Maker* for each of the four sites details the Environmental Impact Assessment (EIA) from the application. Stated simply, the EIA asserts that the occupation has had a long history and the applicant has taken part in restoration and re-vegetation programmes. Forest and Bird submit that this is an incomplete description, because the Otago CMS and the observations of Forest & Bird members suggests that activities related to the occupation are causing adverse effects.
 17. Simply stating that the occupation has occurred for a long time does not demonstrate an absence of adverse effects, as those effects are likely to have been occurring for a long time also. The applicants have not proposed any mitigation of human activity that may result in the above adverse effects.
 18. Furthermore, Forest & Bird submits that the nature hosting a commercial accommodation business via Bookabatch at site 3 will elevate the adverse effects. It is likely that this business will lead to an elevated number of short-term visitors who are less familiar with the extremely high conservation values of the area. As such, the human pressure on the ecosystem is intensified, compared to that of long term owner/occupiers, as is the risk of harmful interactions with wildlife. These are not visitors who have had "*a lengthy history of occupation at this location and [are] aware of the ecological significance of the area*", as claimed in the EIA.
 19. The elevated adverse effects resulting from the commercial accommodation business have not been addressed in the EIA.
 20. To avoid doubt, Forest & Bird is also concerned with other adverse effects resulting from the occupation, such as stormwater and effluent discharge vehicle use or threats to heritage buildings.

Issue: Is the EIA complete and are the adverse effects appropriate for the place?

21. For the above reasons, Forest & Bird submits that the ongoing elevated human presence resulting from the occupation of the four sites is not consistent with the New Zealand Coastal Policy Statement 2010 (NZCPS) Conservation General Policy (CGP), nor the Otago CMS. A non-exhaustive list of inconsistent provisions from those documents is set out below:
 - a. NZCPS:
 - i. Objective 1, which requires the safeguarding of the integrity, form, functioning and resilience of the coastal environment and sustaining its ecosystems;

- b. CGP:
 - i. 4.6(a), which requires activities on public conservation lands and waters should be planned and managed in ways which avoid or otherwise minimise adverse effects on the quality of ecosystem services;
- c. Otago CMS:
 - i. Objective 1.5.1.1(e), which provides priority to conserving features listed in Appendix 9 where they are on PCL, which includes the Aramoana Ecological Area;
 - ii. Objective 1.5.3.12(f), which requires EIAs to identify recreation opportunities on neighbouring PCL that are likely to have minimal environmental and landscape impacts; and
 - iii. the outcome for the Eastern Otago and Lowlands / Maukaatua Place requires that concessionaires manage adverse effects on wildlife, this is not addressed in the EIA.

Issue: have coastal hazards been appropriately considered in the context of the buildings' heritage status?

22. Coastal erosion is already an issue in much of coastal Otago and with the impact of climate change this is only expected to be greater. It is clear that the position of the three heritage buildings places them at risk of coastal hazards. So much so, that the recommendations of the Dunedin Service Centre in section 6.5.1 of the *Notified Concession Officer's Report to Decision Maker* for each of the four sites recommends acknowledging that the sites are within a coastal erosion or other natural hazard zone and that the grantor remove themselves of any responsibility for restoration, repair or incidental matters that might arise from the hazards.
23. If the heritage status of the three buildings is to be valued, then it should also be protected. Forest & Bird submits that it is very likely impossible to protect the three buildings in-situ, because of their hazardous location.
24. Failing to protect the heritage status of the buildings is inconsistent with the NZCPS, the CGP and the Otago CMS. A non-exhaustive list of inconsistent provisions from those documents is set out below:
 - a. NZCPS:
 - i. Objective 5, which requires that coastal hazard risks take into account climate change and are managed;
 - b. CGP:
 - i. Policy 5(e), which requires that historic buildings and structures on PCL be used in ways that enables their preservation; and
 - c. Otago CMS:
 - i. the outcome for the Eastern Otago and Lowlands / Maukaatua Place requires Measures to address sea-level rise effects.

Issue: must a phase out of private accommodation occur and there grounds for an exceptional or special case?

25. The *Notified Concession Officer's Report to Decision Maker* for each of the four sites notes that

"Policy 10(h) of the Conservation General Policy (CGP) clearly requires phasing out of private accommodation on public conservation land. However, it also anticipates that the CMSs will generate timeframes and conditions for the phasing out of existing private accommodation. In other words, it allows the CMSs to direct when and how phase out will occur."

26. Forest & Bird agrees with this statement and notes that the occupation of the four sites is undoubtedly for the purpose of private accommodation.

27. However, in the Summary and Conclusions sections, the *Notified Concession Officer's Report to Decision Maker* for each of the four sites, the Department suggest that the decision maker could consider an exceptional or special case. Case law is given for the definition for an exceptional case but not for that of a special case.

28. This logic suggested by the Department is only available to a decision maker due to the use of the word 'should' in Otago CMS Policies 3.11.1 – 3.11.4. The interpretation of 'should' is clearly provided for in CGP Policy 1(d) as carrying a strong expectation of outcome.

29. Forest & Bird submits that the 'should' direction in the Otago CMS policies is not consistent with the direction in CGP Policy 10(h), which is that:

"Existing private accommodation and related facilities, including encampments, on public conservation lands and waters will be phased out..."

and

"They⁴ should be removed at the end of the phase-out period, unless retained by the Department for public use."

(my emphasis underlined)

30. The nuance in CGP Policy 10(h) is that existing private accommodation will be phased out and the accommodation and related facilities themselves should be removed, unless they are retained for public use.

31. CGP Policy 1(d)(i) provides an interpretation of 'will':

1(d)(i) Policies where legislation provides no discretion for decision making or a deliberate decision has been made by the Minister to direct decision-makers, state that a particular action or actions 'will' be undertaken.

⁴ Referring in the context of the policy to existing private accommodation and related facilities.

32. Putting it all together, there is a fundamental contradiction between relevant policies of the CGP and the Otago CMS. The CGP provides no discretion that private accommodation will be phased out, whereas the Otago CMS provides limited discretion on the matter.
33. Guidance is given in the CGP about contradictions of this type. Policies 1(f) and 1(h) require that the CGP 'will' be applied consistently and approved CMSs have effect except where they clearly derogate from the CGP.
34. Taken together, the decision maker must apply the CGP Policies and therefore has no discretion as to whether a phase out should occur. There are no grounds for either an exceptional or special case with respect to phasing out private accommodation.
35. However, there is consistency between the CGP and Otago CMS Policies in the matter of whether the buildings will be removed or be made available for public use. Both documents provide limited discretion for these pathways with the use of the word 'should'.

Issue: can the Department delay the decision to remove or allow public use of the buildings?

36. With respect to the direction for phasing out private accommodation in the Otago CMS, Policies 3.11.1 – 3.11.4 are relevant. Key provisions for the 4 sites are provided below.

3.11.2 Should phase out all existing private accommodation and related facilities including encampments, on public conservation lands and waters that are not otherwise authorised under section 50 of the National Parks Act 1980 or not specifically provided for or allowed in legislation by either:

a) phasing in public use of the building(s) (see Policy 3.11.4(a)); or

b) removing the building(s) at the end of the phase-out period (see Policy 3.11.4(b)), unless retained by the Department for public use.

3.11.3 Should consult the Otago Conservation Board and the concession applicant when assessing a concession application for existing private accommodation and related facilities, including encampments, to determine whether a concession may be granted and, if so and where relevant, which of the two phase-out methods (Policy 3.11.2(a) or 3.11.2(b)) should be applied.

3.11.4 Should specify the following concession conditions if private accommodation and related facilities, including encampments, are to be authorised in accordance with Policy 3.11.2:

a) in the case of Policy 3.11.2(a), the building(s) are to be made available for use by the public—with specific conditions on how this requirement will be phased in over time stated in each individual concession, including the requirement that any costs charged to the public are reasonable; or

b) in the case of Policy 3.11.2(b), the building(s) are to be removed⁵³ within 18 months of the death of the person named on the authorisation as at 26 June 2013, or within 20 years of approval of this CMS, whichever occurs first; and

(c) ...

Footnote 53: Unless retained by the Department for public use/active management of historical and cultural heritage values.

37. The direction from these policies is that there is a strong expectation that the phase out of private accommodation will take the form of either:

- a. removing the buildings by 2036, 20 years after the Otago CMS was approved; or
- b. making the buildings available for use by the public.

In both cases, the phase out method should be set out via specific concession conditions.

38. However, Table 8 of the *Notified Concession Officer's Report to Decision Maker* for each of the four sites states that:

"Even though policy 10(h) of the CGP states that "They should be removed at the end of the phase-out period, unless retained by the Department for public use.", it is considered that until the phase-out period of 31 August 2036 occurs, the Minister will not be in a position to decide if the buildings are to be retained by the Department for active management of historical and cultural heritage values or public use"

39. Forest & Bird submits that the Department is in error in considering that a phase out can begin in 2036, and a decision on which method to use delayed until that date. Rather, the Otago CMS directs a strong expectation that the method of phase out will be specified in concession conditions, meaning the phase out path is to be set as a result of this current process. If the buildings are chosen to be removed, this must be undertaken by 2036. If facilitating public use of the buildings is chosen, the timeframe must logically be set within the timeframe of the proposed concession.

40. Therefore, there is a strong expectation in the Otago CMS that the Department is not able to delay a decision on how to phase out private accommodation. Forest & Bird seeks that a path for the phase out of private accommodation is laid down if these concessions are granted.

The merits of the phase out pathways and concession timeframes

- 41. The decision maker has discretion on which phase out path to take. Forest & Bird suggests that this decision must therefore be made on merit.
- 42. This submission has provided detail on the surrounding high conservation values, the adverse effects (and the failure to address them in the EIA), the heritage status some buildings, coastal hazards and the future risk of climate change. Based on these factors, Forest & Bird submit that the occupation of the place for private accommodation is not appropriate for the long term.

43. Given the high conservation values and threat to heritage buildings from coastal erosion, Forest & Bird submits that the path most consistent with direction in the CGP and Otago CMS is to remove the buildings. For the heritage buildings, they might be relocated to a more protected site.
44. The alternative, of retaining the buildings for public use and protecting them for their heritage value, does not resolve the coastal erosion risk and is not bound to occur prior to the maximum timeframe for a concession. Such a long-time frame for a phase out is not appropriate, given the adverse effects identified in this submission. If this pathway is chosen, Forest & Bird seeks that a shorter timeframe for the phase out is imposed and any subsequent coastal erosion defences create no adverse effects the surrounding ecosystem.
45. Forest & Bird would support a timeframe that enabled the phase out in either situation to be completed by 2036. This provides the owners/occupiers with reasonable time to enjoy the place and prepare to leave while ensuring that adverse effects from the occupation will not be imposed on the high value surrounding environment in the long term.
46. In the meantime, Forest & Bird seeks that restrictions are placed on activities the concessionaires can carry out within the saltmarsh, so that the disturbance to wildlife and the ecosystem is avoided or minimised. Concessions should only be granted if they are consistent with the purposes and provisions of the NZCPS, the CGP and the Otago CMS. To ascertain this, the EIA will need to be updated by the applicant.
47. Due to the nature of its adverse effects, Forest & Bird submits that a commercial accommodation business is inconsistent with the purposes and provisions of the NZCPS, the CGP and Otago CMS and as such, should not be allowed as part of the concession for any phase out pathway.

Compensation for loss of the buildings and occupation

48. The fully history of the occupation isn't stated in the documents for this process, nor are the details of whether compensation for the loss of property and occupation would be fair. There appears to be no requirement for compensation, but Forest & Bird does sympathise with the current owner/occupiers for likely loss of connection to this place.
49. In the absence of information, Forest & Bird reserves its position on the issue, if it were raised.

Summary and relief sought

50. Forest & Bird opposes the application and recommendations by the Department in their current form.
51. The occupation of the PCL at Aramoana for private accommodation is not appropriate for the long term. On the information provided, it is clear that the EIA is not complete, the adverse effects of the occupation are not appropriate for the place and there is no plan to protect the heritage values of the buildings.
52. The CGP is clear that the occupation must be phased out, either by:
- a. removal of the buildings, or

b. making their use public.

53. The 2036 timeframe recommended by the Department for the concession would not allow for the removal of the buildings to be completed by the deadline.

54. Forest & Bird seeks that a timeframe and conditions be placed on the concession such the phase out can be completed on or before 2036.

55. In the meantime, Forest & Bird seeks that restrictions are placed on activities the concessionaires can carry out within the saltmarsh, so that the disturbance to wildlife and the ecosystem is avoided or minimised. This will require the EIA to be updated.

56. Forest & Bird has no opinion on the method used to preserve the heritage structures, except that it should not create adverse effects on the surrounding environment.

A handwritten signature in black ink, appearing to read 'N. Paragreen', written in a cursive style.

Nigel Paragreen

Committee member, Forest & Bird Dunedin

0272 050 395

Appendix 1 – Photographs from Forest & Bird observations at the saltmarsh







A. Name of Applicant and Concession Number

Site 1: Elizabeth Anne Dawe: 38964-ACC & 50789-OTH

Site 2: Vincent Paul George; Diane Margaret George; Liane Josephine Farry; Richard Vivian Marsh Allen; GSM Trustees Limited: 38965-ACC & 50790-OTH

Site 3: Madeleine Jill Child & Phillip Matthew Jarvis: 38967-ACC & 50791-OTH

Site 4: Joseph Vessels: 38966-ACC & 50792-OTH

B. Name of Activity and Location

Sites 1-4: (North Spit, Aramoana) within the Aramoana Conservation Area and Aramoana Ecological Area.

Sites 1-3: Occupy land by cottage/pilot houses No's 1-3, associated buildings, improvements and ancillary structures. All sites include vehicle and foot access. Paying guests at site 3 only.

Site 4: Occupy land by dwelling, associated buildings (outdoor toilet), improvements and ancillary structures (water tank tower). Includes vehicle and foot access. Subletting of dwelling.

C.1 Objector or Submitter Information-

Objector or submitter's name (list organisational name if objecting or submitting on behalf of a business, community group, etc.)

The Royal Forest and Bird Society Incorporated, Dunedin Branch

Contact person and role of organisation

Nigel Paragreen, member of the Dunedin Branch

Email

(Communication from DOC will be via email unless alternate contact requested)

dunedin.branch@forestandbird.org.nz

Alternate contact for all DOC communication

Phone/Mobile

0272 050 395

Postal Address and Post Code

Forest & Bird Dunedin
PO Box 6230
Dunedin North
Dunedin, 9059

☐ I wish to **keep my contact details confidential**

Note: Your contact details will be not made public, but your name and organisation will be published. DOC will send you all submitter communications.

A. Concession Number and Name of Applicant

Site 1: Elizabeth Anne Dawe: 38964-ACC & 50789-OTH

Site 2: Vincent Paul George; Diane Margaret George; Liane Josephine Farry; Richard Vivian Marsh Allen; GSM Trustees Limited: 38965-ACC & 50790-OTH

Site 3: Madeleine Jill Child & Phillip Matthew Jarvis: 38967-ACC & 50791-OTH

Site 4: Joseph Vessels: 38966-ACC & 50792-OTH

B. Name of Activity and Location(s)

Sites 1-4 below are within Aramoana Conservation Area and Aramoana Ecological Area:

Site 1

- (a) To occupy land by cottage/pilot house No. 1, associated buildings and improvements situated at North Spit, Aramoana;
- (b) To occupy an area around the curtilage of the cottage/pilot house No.1 and ancillary structures for residential purposes;
- (c) To obtain vehicle and foot access to the cottage/pilot house No.1 and ancillary structures via an easement.

Site 2

- (a) To occupy land by cottage/pilot house No.2, associated buildings and improvements situated at North Spit, Aramoana;
- (b) To occupy an area around the curtilage of the cottage/pilot house No.2 and ancillary structures for residential purposes;
- (c) To obtain vehicle and foot access to the cottage/pilot house No.2 and ancillary structures via an easement.

Site 3

- (a) To occupy land by cottage/pilot house No.3, associated buildings and improvements situated at North Spit, Aramoana;
- (b) To rent cottage/pilot house No.3 to paying guests;
- (c) To occupy an area around the curtilage of the cottage/pilot house No.3 and ancillary structures for residential purposes;
- (d) To obtain vehicle and foot access to the cottage/pilot house No.3 and ancillary structures via an easement.

Site 4

- (a) To occupy land by dwelling, associated buildings (outdoor toilet), ancillary structures (water tank tower) and improvements situated at North Spit, Aramoana;
- (b) Subletting of the dwelling;
- (c) To occupy an area around the curtilage of the dwelling and ancillary structures for residential purposes;
- (d) To obtain vehicle and foot access to the dwelling and ancillary structures via an easement.

NOTE: IF YOUR OBJECTION OR SUBMISSION RELATES TO A SPECIFIC SITE THEN CLEARLY IDENTIFY THIS IN YOUR OBJECTION OR SUBMISSION.

C.2 Your name

In placing your name and organisation below, you acknowledge that you are the person or authorised person submitting this objection or submission. You are also acknowledging that your name and organisation will be published.

Printed name of objector or submitter or person authorised on behalf of objector or submitter	Nigel Paragreen
Organisation	The Royal Forest and Bird Society Incorporated, Dunedin Branch
Date	11 April 2022

D. Statement of Support, Neutrality or Opposition

Site 1

- ☐ I **Support** this intention to grant (I am making a submission).
- ☐ I am **Neutral** on this intention to grant (I am making a submission).
- ☒ I **Oppose** this intention to grant (I am making an objection).

Site 2

- ☐ I **Support** this intention to grant (I am making a submission).
- ☐ I am **Neutral** on this intention to grant (I am making a submission).
- ☒ I **Oppose** this intention to grant (I am making an objection).

Site 3

- ☐ I **Support** this intention to grant (I am making a submission).
- ☐ I am **Neutral** on this intention to grant (I am making a submission).
- ☒ I **Oppose** this intention to grant (I am making an objection).

Site 4

- ☐ I **Support** this intention to grant (I am making a submission).
- ☐ I am **Neutral** on this intention to grant (I am making a submission).
- ☒ I **Oppose** this intention to grant (I am making an objection).

E. Hearing Request

- ☐ I **Do Not** wish to be heard in support of this objection or submission at a hearing.
- ☒ I **Do** wish to be heard in support of this objection or submission at a hearing.

F. Objection or submission

The specific site/s that this objection or submission relates to are:

The whole application.

Please see attached submission for further details.

My reasons for my objection or submission are:

Please see attached submission for details.

The outcomes that need to be addressed by these intentions to grant are:

Give precise details, including the site/s and parts of the intention to grant report you wish to have amended and the general nature of any conditions sought if the intention to grant is proceeded with.

Please see attached submission for further details.

G. Attachments

If you are using attachments to support your objection or submission clearly label each attachment, complete the table below and send in your attachments with this 'objection or submission form'.

Document title	Document format (e.g. Word, PDF, Excel, jpg etc.)	Description of attachment
2204010 Aramoana accommodation and easement concessions submission	PDF	Submission

How do I submit my objection or submission?

Complete this form and email to DNSubmissions@doc.govt.nz. You may also mail your objection and submission to: Director-General, c/o Department of Conservation, Ōtepoti / Dunedin Service Centre, Level 1, John Wickliffe House, 265 Princes Street, Ōtepoti / Dunedin 9016. Attention: Kelvin Brown.